



**THE U.S. DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Google, Inc. Cookie Placement

Case No. 1:12-md-02358

Consumer Privacy Litigation

**OBJECTION TO THE SETTLEMENT WITH  
ADDITIONAL DOCUMENTS INCLUDED**

The objector, Dmitrii Mudrechenko disagrees with the statement that he was not a valid class member. The objector was working in the United States as part of the internship program. He would be willing to provide proof, including the port of entry stamp.

The objector, Dmitrii Mudrechenko, disagrees that the proposed settlement is fair, reasonable and adequate. The objector requests the settlement should not be approved as fair, reasonable, and adequate and, in accordance with the settlement's terms; and class counsel's application for attorneys' fees and expenses should be denied.

This objection is filed on his behalf and on behalf of all class members. Dmitrii Mudrechenko is of legal age, a valid class member, a "U.S. consumer" along with being a resident of the State of Minnesota and he wrote this objection himself. In 2011 the objector used the Apple Safari web browser and visited a website from which Doubleclick.net (Google's advertising serving service) cookies were placed. The objector chose to block all cookies from "third parties and advertisers" and visited a non-Google website containing an advertisement served by Doubleclick.net (Google's advertising serving service) and did not already have a cookie from the Doubleclick.net domain but received one as a result of this visit because of means employed by Google to set cookies under these circumstances. He therefore is a valid class member and has standing to object. This objection is made in good faith. The sole purpose of this objection is to benefit class members.

The objector believes the settlement does not directly benefit class members. The \$5,500,000 total sum that Google will pay in connection with this settlement, will not be distributed to class members. In fact, there are no monetary benefits at all available to class members. Therefore, this settlement is not fair, reasonable, or adequate. The goal of this objection is to obtain greater compensation for class members. The objector believes that a significant portion of the fund should be distributed to the class members instead. Attorneys representing plaintiffs argue that no direct monetary payments to class members are based on the difficulty in determining distribution of funds to such a large class. However, in class action lawsuit settlements, it is a well-known practice to establish a website that allows the class members to file a claim themselves and do it electronically. Therefore, claims can be filed fast and efficiently. Providing the class members with tools to file the claim electronically and advertising it on well known class action lawsuits news outlets and forums will ultimately resolve attorneys' concern about difficulty in determining class members.

In addition, the attorneys' fees represent an undue proportion of the fund. Attorneys' fees in the amount of \$1,925,000 are excessive. The fact that the settlement provides approximately \$2 million in attorneys' fees and nothing for the class members is unfair. Similar case occurred in *Chapman v. Tristar Products, Inc.* In *Tristar*, the Arizona Attorney General lodged an objection in the District Court to the terms of the settlement involving allegedly defective pressure cookers. The settlement agreement, entered after the first day of trial, which the Sixth Circuit characterized as "not going well for plaintiffs," provided for approximately \$2 million in attorneys' fees and costs and "substantially less than that—primarily in the form of coupons—for the class members." In *In re Google Inc. Cookie Placement Consumer Privacy Litigation* attorneys are also receiving close to \$2 million in attorneys' fees, but the class members are not receiving even a coupon or google electronic voucher. In fact, *In re Google Inc. Cookie Placement Consumer Privacy Litigation* represents the worst possible award for class members, that is absolute zero.

This objection was mailed to the administrator on 5/27/2023 by prepaid, first class, certified, return receipt mail.

I certify under penalty of perjury of the United States that all of the above is true and

accurate to the best of my knowledge.

A handwritten signature in black ink, appearing to read 'Dmud', with a horizontal line drawn above the letters.

Dmitrii Mudrechenko, Pro se objector, 3155 Bluestem Drive, Unit 134, West Fargo, ND, 58078

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May 27, 2023

Dmitrii M... Case 1:12-md-02358-JDW

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